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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ANDREW CARSON IRVINE,

15 Defendant.

Case No. 2:08-CR-340-GMN-LRL

16
**STIPULATION TO CONTINUE
REVOCATION HEARING
(Second Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Kenneth Nicholas Portz, Assistant United States Attorney,
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
20 and Raquel Lazo, Assistant Federal Public Defender, counsel for Andrew Carson Irvine, that
21 the Revocation Hearing currently scheduled on October 27, 2021 at 10:00 am, be vacated and
22 continued to a date and time convenient to the Court, but no sooner than twenty-one (21) days.
23

24 This Stipulation is entered into for the following reasons:

25 1. Since the last requested continuance, defense counsel was able to meet with
26 Mr. Irvine. Additional time is needed to further confer with Mr. Irvine regarding the alleged
violations.

1 2. Defense counsel requires additional time to further investigate the alleged
2 violations. The requested time will also permit the parties time to attempt to negotiate a potential
3 resolution.

4 3. Government counsel is out of the jurisdiction during the week of November 8,
5 2021. The parties are available during the week of November 15, 2021.

6 4. The defendant is out of custody and agrees with the need for the continuance.

7 5. The parties agree to the continuance.

8 This is the second request for a continuance of the revocation hearing.

9 DATED this 21st day of October, 2021.

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11 RENE L. VALLADARES
Federal Public Defender

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13 CHRISTOPHER CHIOU
Acting United States Attorney

14 */s/ Raquel Lazo*
By _____
15 RAQUEL LAZO
Assistant Federal Public Defender

16 */s/ Kenneth Nicholas Portz*
By _____
17 KENNETH NICHOLAS PORTZ
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
ANDREW CARSON IRVINE,
Defendant.

Case No. 2:08-CR-340-GMN-LRL

ORDER

IT IS THEREFORE ORDERED,

Wednesday, October 27, 2021 at
the hour of 10:00 a.m.

DATED this 21 day of October, 2021.

UNITED STATES DISTRICT JUDGE